

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CAROLYN GREENE, on behalf herself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 03-CV-12628

JOHN G. ESPOSITO, JR., D.D.S., on
behalf himself and all others similarly
situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10013

JOSEPH L. KING, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10038

[Additional Captions Follow on Next Page]

Michael E. CRIDEN, on behalf himself
and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10046

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

ISRAEL SHURKIN and SHARON
SHURKIN on behalf themselves and all
others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10055

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

JAMES J. NIZZO and VIRGINIA C.
NIZZO, as JOINT TENANTS and CARLO
CILIBERTI, on behalf of themselves and
all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10065

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

[Additional Captions Follow on Next Page]

BARRY BROOKS, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10077

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

ANASTASIOS PERLEGIS, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10078

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

MARTIN WEBER, on behalf of himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10090

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

[Additional Captions Follow on Next Page]

BRUCE HAIMS, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-10144

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

MODEL PARTNERS LIMITED, on behalf themselves and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10155

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

JUNE E. PATENAUME, on behalf of herself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10179

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

[Additional Captions Follow on Next Page]

NANCY L. PINCKNEY and GERTRUDE PINCKNEY, on behalf themselves and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

W. KENNETH JOHNSON, on behalf himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10189

Civil Action No. 04-CV-10190

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

GREGORY KRUSZKA, on behalf of himself and all others similarly situated,

Plaintiff,

Civil Action No. 04-CV-10202

v.

BIOPURE CORPORATION, THOMAS A. MOORE, CARL W. RAUSCH and RONALD F. RICHARDS,
Defendants.

NOTICE OF WITHDRAWAL OF MOTION

George Eliopoulos, Dale Self and Mark Mentz, by their counsel, hereby withdraw their motion for appointment as lead plaintiff, filed with this Court on March 1, 2004. This

withdrawal is without prejudice to Messieurs Eliopoulos's, Self's and Mentz's claims and rights as a member of the proposed class, including the right to share in any recovery or settlement of these actions. It is also conditioned on this Court appointing one or more lead plaintiff[s] from among the individuals that filed lead plaintiff applications on March 1, 2004.

Dated: March 17, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**

/s/ Patrick T. Egan

Jeffrey C. Block
Patrick T. Egan
One Liberty Square
Boston, Massachusetts 02109
(617) 542-8300

**COHEN, MILSTEIN, HAUSFELD &
TOLL, P.L.L.C.**

Steven J. Toll
Daniel S. Sommers
Julie Goldsmith
1100 New York Ave. NW.
West Tower, Suite 500
Washington, DC 20005
(202) 408-4600

**Attorneys for Plaintiffs George
Eliopoulos, Dale Self and Mark Mentz**

Biopure/dp/Not_withdrawal_LPMotion